

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE**

**IN RE: WALLIS ELLIOTT,
Debtor.**

**Case No. 14-31426-DSK
Chapter 13**

SELENE FINANCE LP

MOVANT

vs.

**WALLIS ELLIOTT, Debtor;
and GEORGE W. STEVENSON, Trustee**

RESPONDENTS

OBJECTION TO CONFIRMATION

Comes now Selene Finance LP (hereinafter "Movant"), by and through its attorneys, Wilson & Associates, P.L.L.C., and for its Objection to Confirmation of the Chapter 13 plan proposed herein by the Debtor, states:

1. It is the servicer of a deed of trust and note covering the real property commonly known as 3371 Ford Road, Memphis, Tennessee 38109, said property being listed in the Chapter 13 plan of Debtor.

2. Pursuant to 11 U.S.C. §1324, Movant objects to said Chapter 13 plan because the plan lists an approximate arrearage in the amount of \$9,156.77, with a January 2015 ongoing mortgage payment in the amount of \$706.00, and Movant's estimated arrearage is in the amount of \$38,737.50, with a January 2015 ongoing mortgage payment in the amount of \$723.87. Therefore, Movant is not adequately protected.

3. Therefore, the plan does not meet all of the requirements for confirmation.

WHEREFORE, Movant objects to confirmation of the Chapter 13 plan proposed herein by the Debtor, and prays that this Court deny such confirmation, for its costs and attorneys' fees herein, and for all other just and proper relief.

Respectfully Submitted,

WILSON & ASSOCIATES, P.L.L.C.
5050 Poplar, Suite 1015
Memphis, Tennessee 38157
(901) 578-9914

By: /s/ Theodore K. Cummins
Joel W. Giddens (16700)
James Bergstrom (20622)
Theodore K. Cummins (24381)

Attorneys for Movant

CERTIFICATE OF SERVICE

On February 4, 2015, a copy of the foregoing was served via electronic mail, hand delivery, facsimile or United States Mail, postage prepaid, upon the parties listed below.

/s/ Theodore K. Cummins
Joel W. Giddens
James Bergstrom
Theodore K. Cummins

NAMES AND ADDRESSES OF ENTITIES SERVED:

John Edward Dunlap
Attorney at Law
3294 Poplar Avenue, Suite 240
Memphis, TN 38111

George W. Stevenson
Trustee
5350 Poplar Avenue, Suite 500
Memphis, TN 38119

Wallis Elliott
Debtor
3371 Ford Road
Memphis, TN 38109

Joel W. Giddens
James Bergstrom
Theodore K. Cummins
WILSON & ASSOCIATES, P.L.L.C.
5050 Poplar, Suite 1015
Memphis, Tennessee 38157